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April 27, 2021

*Via ECF*

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001, 03-md-1570 (GBD) (SN)*

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) concerning a sealed filing made by Saudi Arabia today. Today’s filing is a letter-motion to adjourn the depositions of five non-party witnesses. Saudi Arabia does not itself assert any confidentiality interest in today’s filing. However, the filing sets out the names of several non-party witnesses. As set forth in the letter, counsel for two of those witnesses has expressed concern about his clients being identified on the public docket as witnesses in this litigation. To permit time for the witnesses to seek redactions to today’s letter, Saudi Arabia respectfully requests that the Court accept today’s filing under seal under the MDL Protective Order, ECF No. 1900.

Saudi Arabia is making today’s filing under seal using the Court’s sealed ECF procedures. Copies of Saudi Arabia’s filing (clean and with highlighted proposed redactions) are being sent today by email to Your Honor’s chambers; to counsel for Plaintiffs, the United States, and Dallah Avco; and to counsel for the two witnesses. Saudi Arabia does not currently know the identity of counsel (if any) for the other three witnesses. No courtesy copies of either this letter or today’s sealed filing are being sent to the chambers of Judge Daniels, as instructed by the temporary revisions to his Individual Practices in light of the ongoing public health crisis.

Respectfully submitted,

*/s/ Michael K. Kellogg*

Michael K. Kellogg  
*Counsel for the Kingdom of Saudi Arabia*

cc: All MDL Counsel of Record (via ECF)